

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

CARLTON F. BENNETT, et al.

Plaintiffs

v.

CASE NO. 2:17-cv-00092

JOHN E. ZYDRON, et al.

Defendants

**DECLARATION OF KRISTAN B. BURCH IN SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

I, Kristan B. Burch, of full age, hereby declare as follows:

1. I am a member of the Bar of this Court and a partner at the law firm of Kaufman & Canoles, P.C. Kaufman & Canoles, P.C. represents Defendants John E. Zydron and Zydron Law Firm, PLLC, and I have personal knowledge of the facts set forth herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt of the deposition transcript of John E. Zydron whose deposition was recorded under oath on March 22, 2018.

3. Attached hereto as **Exhibit B** is a true and correct copy of the relevant web pages from the Zydron Law Firm, PLLC's website, <http://www.zydronlaw.com> as of February 2017. Exhibit B has been annotated in pen by counsel to show where the cases listed in Paragraph 7 of the Complaint were listed on the Zydron Law Firm website.

4. Attached hereto as **Exhibit C** is a true and correct copy of Carlton F. Bennett and Bennett and Sharp, PLLC's Answers to John E. Zydron's Requests for Admission.

5. Attached hereto as **Exhibit D** is a true and correct copy of Carlton F. Bennett and Bennett and Sharp, PLLC's Supplemental Responses to Zydron Law Firm, PLLC's Interrogatories and Request for Production of Documents.

6. Attached hereto as **Exhibit E** is a true and correct copy of the relevant web pages from the Bennett and Sharp, PLLC website, <https://www.bennettandsharp.com/>, as of February 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 4, 2018

/s/Kristan B. Burch
Kristan B. Burch
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system on this 4th day of May, 2018, which will then send a notification of such filing to the following:

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